

AO 91 (Rev. 11/11) Criminal Complaint

**FELONY**

United States Courts

**UNITED STATES DISTRICT COURT**

Southern District of Texas

for the  
Southern District of Texas

FILED

April 07, 2025

United States of America )

Nathan Ochsner, Clerk of Court

V. )

Case No. )

1:25-MJ-263 )

Alfredo Balderas )

Defendant(s) )

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 04/05/2025 in the county of Cameron in the Southern District of Texas, the defendant(s) violated:

*Code Section*Title 21, United States Code, Section 841(a)(1); and  
Section 846*Offense Description*knowingly and intentionally possess with intent to distribute 77.5  
kilograms of cocaine, a Schedule II controlled substance, while  
conspiring to commit the same.

This criminal complaint is based on these facts:

See attachment A



Continued on the attached sheet.

Submitted by reliable electronic means,  
sworn to signature attested telephonically  
per Fed. R. Crim. P.4.1, on4/7/2025

Date

Brownsville, Texas

City and State

Margo Westcott

Complainant's Signature

Margo Westcott HSI Special Agent

Printed name and title

Ignacio Torteya III

U.S. Magistrate Judge

Printed name and title

1:25-MJ-263

ATTACHMENT A

AFFIDAVIT

United States Courts  
Southern District of Texas  
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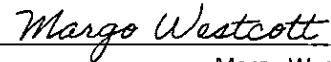
Nathan Ochsner, Clerk of Court

I, Margo Westcott, a Special Agent of the U.S. Immigration and Customs Enforcement, Homeland Security Investigations, being duty sworn, hereby depose:

1. On April 5, 2025, ALFREDO BALDERAS (hereinafter BALDERAS) was encountered by a deputy for the Cameron County Sheriff's Office (CCSO) during a stop for a traffic violation in San Benito, Texas. BALDERAS was the driver and sole occupant of a white Ford Edge, bearing temporary Texas license plates. BALDERAS did not have in his possession his driver's license or vehicle registration. During the encounter, BALDERAS appeared nervous and gave inconsistent statements to the deputy regarding vehicle's ownership.
2. At this time, the CCSO Deputy noticed an open container in the vehicle and asked BALDERAS to step out of the vehicle. BALDERAS exited the vehicle and was asked if there was anything in the vehicle. In response, BALDERAS admitted to the CCSO Deputy that there was cocaine in the vehicle.
3. Thereafter, a positive K9 alert on the vehicle led to the discovery of two large white commercial feed bags with silver tape, one grey duffle bag, and one blue duffle bag in the trunk of the vehicle. All four bags contained bricks wrapped in red, green or black tape, of which BALDERAS stated was cocaine. BALDERAS and the contents of the vehicle were taken into custody and transported to CCSO for interview and processing.
4. The contents of the four large bags, which consisted of 70 bricks, field tested positive for cocaine with a total weight of 77.5 kilograms.

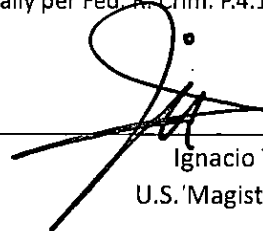
I make this affidavit on the basis of my personal knowledge, as well as the basis of information furnished to me by other law enforcement officers.

ALFREDO BALDERAS was transported to the Cameron County Jail in Olmito, TX for housing.



Margo Westcott  
Special Agent, HSI

Submitted by reliable electronic means, sworn to signature attested telephonically per Fed. R. Crim. P.4.1, on this 7<sup>th</sup> days of April 2025.



Ignacio Torteya, III  
U.S. Magistrate Judge